

# **EXHIBIT 6**



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**CONFIDENTIAL**

*Via Email*

Donald McPhail  
Eric R. Chad  
Paige S. Stradley  
Merchant & Gould  
150 S 5th St Unit 2200,  
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Re: *Valve Corp. v. Leigh Rothschild et al.*, No. 2:23-cv-1016 (W.D. Wash.): Deficient response to interrogatory regarding rights to license the '221 patent

Counsel:

RBDS's, PAM's, and Rothschild's response to Interrogatory Nos. 12, 6, and 8, respectively, are incomplete. These interrogatories seek in relevant part the identification of "all Persons who have a right to license or sublicense the '221 patent." The Rothschild Defendants' responses only state that RBDS and PAM have the right to license the '221 patent and that RPX can sublicense the '221 patent. Based on the Rothschild Defendants' document production, this answer is incomplete. For example, the License Agreement between Blink Global LLC and Macerich Management Company suggests that both Blink Global LLC and Symbology Innovations, LLC have rights to license and/or sublicense the '221 patent. *See* ROTHSCILD0032297 at 1 ("WHEREAS, BL.INK has the right to grant licenses to the Symbology Patents (defined below) through an agreement with Symbology Innovations, LLC ('Symbology')"); *id.*, § I.2 ("Symbology Patents' means (1) U.S. Patent Nos. ... 8,856,221 ...").

The Rothschild Defendants have also not produced the agreement between Symbology and BL.INK referenced in ROTHSCILD0032297 and evidencing Symbology's and BL.INK's right to sublicense the '221 patent.

In addition, the Rothschild Defendants cite to ROTHSCILD003181-82 which are pages 2-3 of Defendant Informed Data Systems, Inc.'s motion to dismiss in *Display Technologies, LLC v. Informed Data Systems, Inc., d/b/a One Drop*, Case No. 1:22-cv-00441-JMF (S.D.N.Y.). This is not responsive to Interrogatory No. 12.

These interrogatories also seek an identification of "all Documents describing" the information requested. The Rothschild Defendants have not identified any documents describing or evidencing PAM's right to license the '221 Patent. To the extent not already done, the Rothschild Defendants must produce any such documents and supplement their responses to identify them.

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Finally, Mr. Rothschild's response to corresponding Interrogatory No. 8 only answers that interrogatory as to his rights to license and enforce the '221 patent. Mr. Rothschild must fully respond to Interrogatory No. 8 based on the knowledge and documents within his possession, custody, or control. PAM's response to Interrogatory No. 6 is similarly deficient in that it provides information only about RBDS and PAM.

Please confirm that the RBDS, PAM, and Mr. Rothschild will supplement their responses to RBDS Interrogatory No. 12, PAM Interrogatory No. 6, and Rothschild Interrogatory No. 8 to address these deficiencies by May 16, 2025. If Defendants will not do so, please provide a time to meet and confer on May 19, 2025.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dario A. Machleidt', with a stylized flourish at the end.

Dario A. Machleidt